

EXHIBIT B



Josh Rosenthal <joshr@asianlawcaucus.org>

here's the Motion - with suggested edits

Josh Rosenthal <joshr@asianlawcaucus.org>

Fri, Sep 26, 2025 at 8:01 AM

To: "Yen, Shawna (USAMA)" <Shawna.Yen@usdoj.gov>

Cc: "Arevalo, Luz" <larevalo@gbis.org>

Hi Shawna,

Luz and I talked about the next steps, and in lieu of meeting in early next week, we are happy to provide our request for next steps in writing:

- A production of all exchanges leading up to the creation of the August 27 letter, as well as subsequent communications regarding the letter--including at a minimum the ICE request referenced in the letter;
- Records of communications regarding requests for data and responses from ICE/HLS that was the subject of the earlier NY Times article cited in the FOIA request. These communications may exist as emails, memoranda, transcribed messages, letters, etc. and the NY Times article described the agreement as having come from former Acting Commissioner Dudek himself and it therefore may be located in his records or correspondence. For your convenience, here is a ["gift link"](#) to the article.
- A list of the places where the SSA conducted its search for responsive records, including for the items in a and b above, any search terms or other methods used to conduct the search, and the personnel involved, by title.

Would 7-10 days suffice for this? Our goal is to touch base once you complete and remit these records.

All the best,

Josh

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